Point of Service and Meal Counting

Overview
Point of service (POS) includes two distinct aspects:
- Identify a student's eligibility status (free, reduced, or paid) when they receive a reimbursable meal
- Identify the student has selected a reimbursable that can be then counted and claimed for reimbursement

Meal counting refers to the process of accurately collecting and maintaining data at the POS to then be able to submit meal count totals, including how many free, reduced, and paid meals were served, at the end of each month for reimbursement. The National School Lunch Program (NSLP), School Breakfast Program (SBP), Afterschool Snack Program (ASSP), and Special Milk Program (SMP) all require meals/snacks/milk to be counted at the POS. The Fresh Fruit and Vegetable Program (FFVP) does not include a POS or meal count component. Meal counts are entered into MyIdahoCNP under *Claims.* Please see the Claims section of this reference guide for additional information on submitting a claim.

The two aspects involved in POS can be observed at the same place (i.e., at the end of the meal service line) or in two different locations (i.e., a cashier checks students in at the beginning of the line to identify if the student is free, reduced, or paid and another adult is at the end of the line determining if the children select a reimbursable meal).

Terminology
Benefit Issuance List - A document (can be electronic or handwritten) that lists each student enrolled in the school and their school meal benefits status- free, reduced, or paid. This document must be kept confidential. Accurate maintenance of this document is a requirement of the National School Lunch Program and School Breakfast Program.

Edit Checks – The process that is required to be completed prior to submitting a claim for reimbursement; the process may be automated or manual. This process ensures the meal claim is accurate prior to submittal for payment.

Eligibility Status – A student's free, reduced, or paid status as determined by submission of a Free and Reduced Application, living in a household that is receiving Program Assistance benefits (SNAP, TANF/TAFI, FDPIR) or identified as homeless, migrant, runaway, foster, or enrolled in Head Start.

Non-Program Adults – Adults that do not work in any direct way with the meal service. Meals served to non-Program adults must be charged at least the full cost of the meal (including food and non-food supplies, labor and the value of commodities) or use other non-Program funds to cover the cost of these meals.

Non-systemic - Refers to factors in the meal counting process that are unusual, and not part of the normal operating procedure, that resulted in an error occurring in the process. The entire system does not require a change to achieve accurate results when an error is non-systemic.

Overt Identification - Any action that may result in a child being recognized as potentially eligible to receive or be certified for free or reduced price school meals or free milk.

Point of Service (POS) - The point in the food service operation where a determination can accurately be made that a reimbursable free, reduced price, or paid lunch has been served to an eligible child.

Program Adults – Adults that work directly with the preparation or service of meals. Meals may be served free to adults who meet this definition. These meals may not be claimed for reimbursement but may be counted as legitimate operating costs.

Reimbursable – A meal that meets federal requirements for meal components and dietary specifications.

Systemic - Refers to factors built into the meal counting process that would likely recur if not changed and result in continued errors.

What are Point of Service and Meal Counting?
Several topics involved with understanding point of service and meal counting are explained below. These concepts are closely examined as part of the Administrative Review process.

Electronic or Manual/Combination Counting System
The School Foodservice Authority (SFA) may use an electronic or manual/combination system for the POS.
- An electronic system requires a POS software program and could include steps like students swiping a meal card, students entering an identification number on a key pad, or a food service employee checking the students into the computer system at the POS. There are several POS software systems on the market and the SFA should select a program that is appropriate to meet the needs of their sites.
- A manual/combination system is being utilized when a food service employee uses a paper roster and checks students off at the POS, and then goes back at a later time and enters the students into a POS software program for counting purposes.

Either an electronic or manual/combination system are allowable for use at the POS, as long as the system and process used yield an accurate count of how many free, reduced, and paid reimbursable meals were served. When the SFA's meal counting process involves several steps, multiple transfers of counts from one document/computer to another and/or many different sub processes within the main meal counting process, this is suggestive of a high likelihood of errors occurring. The POS and subsequent meal counting process should be streamlined and consistent.

Backup Counting System
The SFA must have some kind of backup system in place to count student meals, in case their primary system gets compromised. Examples include if the power goes out and the SFA uses a computer to check students in at the POS. All SFAs who use an electronic system must have a backup paper roster (the benefit issuance list) on hand to use in case the POS software program is unavailable. A master copy of the roster should be saved in a secure but accessible location; saved both electronically and a hard copy.

Staff Training
All staff, including substitute employees, who work at the POS, must receive adequate training. POS training is two-fold, staff must understand the importance of checking in every student who receives a

meal AND ensuring the student has selected a reimbursable meal. Staff training may occur by attendance at the annual NSLP mandatory training or at a local training put on by the food service director. If training occurs at the local level, a sign in sheet and agenda must be kept on file. This creates documentation for each school year and allows for recordkeeping of 3 years plus the current year.

Reimbursable Meals Signage
In order to have a compliant POS system, the SFA must identify what constitutes a reimbursable meal near, or at the beginning of the serving line, to allow students to know what items they must select and avoid selecting a meal that is not reimbursable and/or includes additional a la carte items that they do not wish to purchase. Identifying a reimbursable meal may be accomplished utilizing signage and/or white boards that are updated daily. The State Department of Education has created "*What's for Lunch"* and "*What's for Breakfast"* posters that SFAs may utilize to identify a reimbursable meal.

Overt Identification
Maintaining the confidentiality of a child's free, reduced, or paid status is of the highest importance. SFAs must assure that a child's eligibility status is not disclosed at any point in the process of providing free or reduced price meals, including during the providing of meals in the cafeteria and at the point of service. Overt identification can be a challenge at the point of service (POS), as children may need to provide money and/or a fund balance may be visible on a computer screen if an electronic POS system is being used. Schools must ensure to the maximum extent practicable, that the method of payment or POS system does not result in children being inadvertently identified as receiving free or reduced price meal benefits.

Incomplete/Non-reimbursable Meals
If it is identified at the POS that a student **has not** selected a reimbursable meal, there are two options.
- Ideally, the food service employee will request the student return to the meal service line and select the necessary food component(s) to provide a reimbursable meal. If the student goes back and makes the necessary additions to their meal, they are included in the meal count and no further action is necessary.
- If the student declines to return to select the required food components, the student must be charged a la carte pricing for each individual item on their tray and their meal CANNOT be counted and claimed for reimbursement.

Second Meals
Schools choosing to offer students a second meal may not claim these meals for Federal reimbursement; however these meals are counted in the nutrient analysis and can cause calories to be above dietary specifications.

Visiting Student Meals
Students who are enrolled in one school but are visiting a school in another school district (and whose benefit status is undocumented) are charged the student meal price and are claimed as paid. If there is an agreement among school districts and benefit status is documented, the visiting student may be charged and claimed in accordance with the benefit issuance list. Students and/or siblings who are not enrolled in any school are charged the adult meal price.

Student Worker Meals

Schools with student workers claim these meals according to the benefit issuance list which documents free, reduced, or paid status. It is recommended that student helpers are not charged for their meal cost if they are categorized as reduced-price or paid status.

Adult and Non-Student Meals

Meals may be served to adults at sites at the discretion of the sponsor. Adult meals are treated differently than meals served to children, as adult meals are not counted and claimed for reimbursement.

Adults are classified as either a Program or a non-Program adult. .

- Program Adults work directly with the meal service at the site as either a food service volunteer only or a paid employee (with at least 50% of salary coming from food service). Meals may be served free to adults who meet this definition. These meals may not be claimed for reimbursement, but may be counted as legitimate operating costs.
- Non-Program Adults do not work in any direct way with the meal service at the site, such as a teacher or school staff. SFAs must either charge the full cost of the meal (including food and non-food supplies, labor, and the value of commodities), or use other non-Program funds to cover the cost of non-Program adult meals. If full meal cost calculations are not determined, adult meals must be charged a minimum price determined and set by USDA guidance to ensure that USDA funds are not subsidizing adult meals.

Additionally, when serving adults the sponsor must ensure:

- All children must be fed first.
- Income from the sale of adult meals and non-Program funds used to pay for adult meals must be documented as income to the Program to offset documented costs.
- Meals served to children (including second meals), Program adults, and non-Program adults must be counted and recorded separately on the daily count form/system.

A la Carte

A la carte refers to food items available for cash sale independent of the reimbursable meal. Items sold a la carte are not counted at the POS for purposes of receiving reimbursement. Food service staff must be able to properly distinguish reimbursable meals from a la carte purchases. Any food items sold a la carte do need to be documented on the daily production records.

Field Trips

To be eligible for reimbursement, meals must be consumed on site, unless the meal is served on a State agency approved field trip. Meals taken on school supervised field trips must meet the meal pattern requirements and the trips must be part of a curriculum as defined by the State Department of Education, not extracurricular events, in order to be claimed for reimbursement. Meals served on field trips should be subject to especially stringent food safety measures to avoid contamination and spoilage. Offer verse serve (OVS) is not required as part of field trip meal service. The SFA must devise a local process to accurately count meals served at off-site events; contact the State agency if additional technical assistance is required.

Share Table

Sponsors may designate a "share table" or stations where children may return whole food items they choose not to eat, provided this is in compliance with local and State health and safety codes (check with your local public health inspector to find out their rules). These items are then available to other

children who may want additional helpings. Nonperishable components that remain on the share table may be appropriately stored for subsequent service. All recycled food items must be stored in accordance with local health codes and follow HACCP standard operating procedures for food safety. There is no charge for items and, additionally, no POS or meal counting and claiming requirements associated with implementing a "share table." It is a local decision to offer a "share table." This food is in no way supposed to be taken by teachers to use in their classroom.

Lost, Stolen, Misused, Forgotten or Destroyed Tickets, Tokens, IDs, and PINS
If tickets, tokens, student ID cards, or any other medium that may be used by schools to identify the eligibility category of students are used, supporting documentation (i.e., the benefit issuance list or roster) must be kept that supports how the eligibility status was determined. Therefore, if a student presents without the normal identifier used at the POS (e.g., a forgotten student ID number or damaged ID card), the food service staff may refer to their back up documentation to validate the status of the student and ensure they receive a meal and are accurately claimed. Processes should be in place at the local level to ensure student identifiers are not stolen or misused. If it's discovered that abuse of a student identifier has occurred, resulting in incorrect meal counts and/or claims, the SFA may contact the State agency for guidance.

Charged and/or pre-Billed/pre-Paid Meals
This process is determined and implemented at the local level. Pre-pay meal systems are allowable and may be convenient for households. Proper accounting must be in place to ensure the food service account receives pre-paid funds for meals. SFAs may charge a fee to households for the service of offering an online option allowing parents to add money to a child's meal account, but only if the SFA also offers a method for households to add money to the account that does not add any additional fees (e.g., a check or cash may be turned into the school office for a meal account). If the food service account has the funds, they may be used to cover the costs associated with providing an online payment service to households.

Students without Funds to Pay for Meals
The SFA must create and implement a Student Charging Policy. This policy is created at the local level. The effectiveness of the Student Charging Policy and how unpaid balances are addressed at the end of the school year will be observed during an Administrative Review. Student balances carried over from year to year is considered bad debt and is unallowable in Child Nutrition Programs. A process must be developed and implemented to ensure that bad debt is addressed and covered by general funds.

New Students without Approved Certification of Free or Reduced-Price Benefits
Students transferring within the same local education agency (LEA) may be approved based off a previously approved application from that school year. Students new to the LEA, unless they are determined eligible through direct certification, require the household to submit an application to receive meal benefits. LEAs are encouraged to expedite eligibility determinations for new enrollees. Please refer to: Processing Applications in the most current Eligibility Manual for School Meals for additional details, including information regarding transfer students from/to SFAs operating CEP or Provision 2 as well as the 30 operating day carryover period from the previous year's eligibility.

Edit Checks
An edit check refers to the procedure(s) used by the SFA to compare each site's daily counts of free, reduced, and paid meals against the number of children in that site currently eligible for free, reduced, and paid meals AND the attendance adjusted enrollment. The SFA must have edit checks in place in the

meal counting and claiming processes to ensure accuracy of the claims submitted and received for reimbursement.

- POS Counting Review: A required edit check or internal control is completion of POS Counting Reviews by February 1 of each year for all SFAs that have multiple POS. The POS Counting Review form is available in MyIdahoCNP in Download Forms.
- Claim Edit Check: Reimbursement Accuracy Check (RAC sheet) or software program that performs this function. Additional required edit checks include comparison of daily free, reduced, and paid counts against total counts of students eligible for free, reduced, and paid meals and the attendance adjusted counts, and having a system in place to follow up when counts suggest a counting problem exists. To accomplish these edit checks there may be two staff checking the meal counts prior to the claim being submitted, review of reports from the POS software etc. Validation of appropriate edit checks will be done as part of the Administrative Review. All documentation associated with edit checks must be kept on file at the SFA for three years plus the current year.

Alternate Points of Service
The SA may authorize alternate points of service provided that such alternatives result in accurate, reliable counts of the number of free, reduced, and paid meals served. SFAs may submit, in writing, requests to the SA for approval of alternate points of service; please contact the SA for additional information. Alternate points of service must also be specified in the SFA's annual NSLP Renewal Application.

Why are POS and Meal Counting Important?
School districts and independent schools that choose to take part in school meals programs get cash subsidies and USDA foods from the United States Department of Agriculture (USDA) for each meal they serve. In return, they must serve meals/snacks/milk that meet Federal requirements, and they must offer free or reduced price meals to eligible children.
The point of service is a crucial component of the NSLP, SBP, ASSP, and SMP because it ensures students walk away with a reimbursable meal and that each reimbursable meal is counted, allowing the SFA to claim each meal and receive reimbursement from the USDA to cover the costs of offering school nutrition programs.

Resources
Additional resources may be available for this topic. Please check the Idaho School Nutrition Reference Guide website for copies of manuals, user guides and helpful links to relevant subject matters.